

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

BRENDAN PICHA and MAX J. HASTINGS,
Individually and on Behalf of All Others
Similarly Situated,

Plaintiffs,

v.

GEMINI TRUST COMPANY, LLC, TYLER
WINKLEVOSS and CAMERON
WINKLEVOSS,

Defendants.

Case No. 1:22-cv-10922-NRB

**DECLARATION OF DANIEL P. CHIPLOCK IN SUPPORT OF
THE GEMINI INVESTOR GROUP FOR APPOINTMENT AS LEAD PLAINTIFF
AND APPROVAL OF SELECTION OF LEAD COUNSEL**

I, Daniel P. Chiplock, declare, under penalty of perjury, the following:

1. I am a partner with the law firm of Lieff, Cabraser, Heimann & Bernstein, LLP (“Lieff Cabraser”), counsel for class members Gregory Ingallina, Bartholomew Ingallina, Tze (“Eddie”) Ling Ng, and Christine Hogan (collectively, the “Gemini Investor Group” or “Movant”) and proposed Lead Counsel for the class. I submit this Declaration in support of Movant’s Motion for Appointment as Lead Plaintiff and Approval of Selection of Lead Counsel.
2. Attached hereto as Exhibit A is a true and correct copy of the notice published on *Business Wire* on December 29, 2022 in connection with the above-captioned action.
3. Attached hereto as Exhibit B is a true and correct copy of the Certification of Proposed Lead Plaintiff of each member of the Gemini Investor Group setting forth their Gemini Earn investments during the relevant period.
4. Attached hereto as Exhibit C is a chart analyzing the Gemini Investor Group’s losses from its Gemini Earn investments.
5. Attached hereto as Exhibit D is a true and correct copy of the Joint Declaration of the Gemini Investor Group In Support of Motion for Appointment as Lead Plaintiff and Approval of Selection of Lead Counsel.
6. Attached hereto as Exhibit E is a true and correct copy of the firm resume of Lieff, Cabraser, Heimann & Bernstein, LLP.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Dated: February 27, 2022
New York, New York

/s/ Daniel P. Chiplock
Daniel P. Chiplock